

SONYA Z. MEHTA, SBN 294411  
SIEGEL, YEE, BRUNNER & MEHTA  
475 14th Street, Suite 500  
Oakland, California 94612  
Tel: 510-839-1200  
Fax: 510-444-6698  
[sonyamehta@siegelyee.com](mailto:sonyamehta@siegelyee.com)

DAT HOANG PHAN, SBN 316813  
HENNIG, KRAMER, RUIZ AND SINGH, LLP  
3600 Wilshire Boulevard  
Suite 1908  
Los Angeles, CA 90010  
Tel: 213-310-8301  
Fax: 213-310-8302  
[dat@employmentattorneyla.com](mailto:dat@employmentattorneyla.com)

RETU R. SINGLA, SBN 4162822  
Tel: 646-228-4719  
[rsingla@workingpeopleslaw.com](mailto:rsingla@workingpeopleslaw.com)  
SETH L. GOLDSTEIN, SBN 2160182  
Tel: 646-460-1309  
Fax: 251-319-2955  
[sgoldstein@workingpeopleslaw.com](mailto:sgoldstein@workingpeopleslaw.com)  
JULIEN MIRER SINGLA AND  
GOLDSTEIN PLLC  
One Whitehall Street, 16th Floor  
New York, NY 10004  
ADMITTED PRO HAC VICE

Attorneys for Defendant  
TRADER JOE'S UNITED

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

TRADER JOE'S COMPANY, a California  
corporation,

Plaintiff,

vs.

TRADER JOE'S UNITED,

Defendant.

Case No. 2:23-cv-05664-HDV-MAR

**DEFENDANT TRADER JOE'S  
UNITED'S APPLICATION TO  
APPEAR REMOTELY**

Filed Concurrently with Declaration of  
Retu Singla

Hon. Hernán D. Vera  
Date: November 9, 2023  
Ctrm: 5B  
Time: 10:00 a.m.

Complaint Filed: July 13, 2023

**APPLICATION TO APPEAR REMOTELY**

Defendant Trader Joe's United respectfully requests that this Court allow its lead counsel Retu Singla to appear remotely for the hearing on Defendant's Motion to Dismiss scheduled for November 9, 2023, at 10 a.m. in Los Angeles.

There is good cause for a remote appearance. Defendant's Lead Attorney Singla has led this case from the inception and is most equipped to argue Defendant's motion. (Declaration of Retu Singla, ¶ 1.) Indeed, she will argue the motion. (Id.) However, Attorney Singla resides in New York, and it would be a long and expensive trip to fly to Los Angeles. (Id., ¶ 2.) It would significantly impact Trader Joe's United, a fledgling union with extremely modest funds, to have to pay for the flight for Attorney Singla to appear. (Id., ¶ 2, 6.) TJU needs its meager funds to maintain its union against Plaintiff's documented unfair labor practices against it. (Id., ¶¶ 4-5.)

In addition, by eliminating the need for travel, Attorney Singla will have more time to engage in her frequently pro bono work for working people and newly organizing workers. (Id., ¶ 7.)

Dated: November 2, 2023

SIEGEL, YEE, BRUNNER & MEHTA

By: /s/ Sonya Z. Mehta  
Sonya Z. Mehta

Attorneys for Defendant  
TRADER JOE'S UNITED